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Painesville Office
June 20, 2025

MEMO ENDORSED

VIA CM/ECF

Hon. Jessica G. L. Clarke
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

RE: *Pini v. Sullivan County*, Case No. 7:25-cv-02194-JGLC
Letter Motion and Notice to Court re: Service Issue and Upcoming Dates

Dear Judge Clarke:

On March 17, 2025, Plaintiffs filed this action, concurrently requesting this matter be administratively related to *Cavaluzzi et al. v. Sullivan County*, Case No. 1:23-cv-11067-PAE as Plaintiffs' claims in both cases purport to seek recovery for the same conduct against the same defendant, except this matter seeks relief for a Rule 23 putative class. However, Judge Engelmayer (the Judge presiding over the *Cavaluzzi* matter) denied such request. Subsequently on June 11, 2025, Electronic Summons was issued as to Defendant Sullivan County. Doc. 12. However, that summons has not reached Defendant as of yet.

Plaintiffs have been in contact with counsel for Defendant in the *Cavaluzzi et al. v. Sullivan County*, Case No. 1:23-cv-11067-PAE matter, who have confirmed they will be counsel for Defendant in the present matter. As such, they are generally aware of the case, but will not accept service for Defendant Sullivan County. As a result, service has not been perfected.

Therefore, the undersigned respectfully requests the dates set by the Court's Order of Doc. 5 for a) the meet and confer, submission of a joint letter with a joint proposed Civil Case Management Plan and Scheduling Order, and b) subsequent Initial Pretrial

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Conference with the Court (June 23, 2025 and June 30, 2025, respectively) be adjourned and re-set pending effectuation of service (which will be accomplished shortly).

Respectfully submitted,

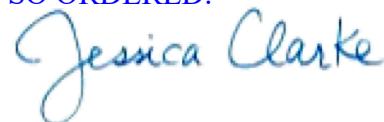
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One of Counsel for Plaintiffs

cc: All Counsel of Record via ECF

Application GRANTED. The conference on June 30, 2025 and deadlines for related submissions are ADJOURNED *sine die*. The Clerk of Court is directed to terminate ECF No. 13.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge
Dated: June 23, 2025
New York, New York